

PRIME TANNING COMPANY)	DEPARTMENTAL
YORK COUNTY)	FINDINGS OF FACT AND ORDER
BERWICK, MAINE)	AIR EMISSION LICENSE
A-376-70-E-R)	

After review of the Part 70 License amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Prime Tanning Company (Prime)
LICENSE NUMBER	A-376-70-E-R
LICENSE TYPE	Part 70 License Renewal
NAICS CODE	31611-Leather Tanneries
NATURE OF BUSINESS	Leather Tanning and Finishing
FACILITY LOCATION	Sullivan Street, Berwick
DATE OF LICENSE ISSUANCE	January 27, 2006
LICENSE EXPIRATION DATE	January 27, 2011

B. Emission Equipment:

The following sources are addressed by this Part 70 License:

Fuel Burning Equipment

EQUIPMENT ID	UNIT CAPACITY	UNIT TYPE
Boiler #1	33.5 MMBtu/hr	Cleaver Brooks Boiler
Boiler #3	20.9 MMBtu/hr	Ames Boiler
Boiler #4	20.9 MMBtu/hr	Ames Boiler

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Process Equipment

OPERATION	STACK ID	STATIONS PER LINE	POLLUTION CTRL EQUIPMENT	POLLUTANT CTRL'D & EFFICIENCY
TANDEM	SPTA, SPTB, SPTC, SPTD, SPTE	SWAB TABLE or ROLLER COATER, DRYER, SPRAY BOOTH, DRYER, SPRAY BOOTH, DRYER	COLLECTION PADS	PM, 85%
SEASON OIL LINE	SOL#1A, SOL#2B	ROLLER COATER, PREHEATER, SEASON OIL APPLICATOR, DRYER	—	
BUFFING LINE 1	BUF#1A, BUF#1B	PREHEATER, BUFFER, AIRKNIFE	BAG HOUSE	PM, <95%
BUFFING LINE 2	BUF#2	BUFFER, AIR KNIFE	BAG HOUSE	PM, <95%
BUFFING LINE 3 *	BUF#2	BUFFER, AIR KNIFE	BAG HOUSE	PM, <95%
TUMBLE MILLS**	—	—	BAG HOUSE	PM, <95%
WHOLE HIDE SPRAY	SPW#1A, SPW#1B, SPW#2A, SPW#2B	SPRAY BOOTH, DRYER, SPRAY BOOTH DRYER	WET SYSTEM	PM, 85%
SIDE SPRAY LINE 1	SPS#1A, SPS#1B	SPRAY BOOTH, DRYER	WET SYSTEM	PM, 85%
SIDE SPRAY LINE 2	SPS#2A, SPS#2B	SPRAY BOOTH, DRYER	WET SYSTEM	PM, 85%
SIDE ROLLMAC	RCS#2	ROLLER COATER, DRYER	—	
WHOLE HIDE ROLLMAC	RCW#1	ROLLER COATER, DRYER	—	
DUBOIS**	—	ROLLER COATER	—	
LIME SILO	—	—	BAG HOUSE	PM, < 95%
FOUR HAND SPRAY BOOTHS	HSP#1-HSP#4	(4) HAND SPRAY BOOTHS	COLLECTION PADS	PM, 85%
SAMPLE SPRAY BOOTH	-	SPRAY BOOTH, DRYER	COLLECTION PADS	PM, 85%
HAND RUB TABLES	-	MANUALLY APPLIED WITH HAND-HELD PADS	NONE	-
R&D DRYER **	—	DRYER	NONE	-
TUMBLE **	—	—	BAG HOUSE	PM, < 95%

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PREMATCH SPRAY BOOTH #1	PMB#1	HAND SPRAY BOOTH	COLLECTION PADS	PM, 85%
PREMATCH SPRAY BOOTH #2	PMB#2	HAND SPRAY BOOTH	COLLECTION PADS	PM, 85%

- * New machine requested per this Part 70 license renewal
- ** Not vented to outside

Prime Tanning has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department's Regulations. Some of the equipment considered insignificant are listed below:

Description	Reason
Plant Space Heaters	Chapter 140 Appendix B;B.3
(2) 12,000 gal #6 Fuel Oil Storage Tanks	Chapter 140 Appendix B;B.4
Mixing of Tanning and Finishing materials to be used throughout the plant (Including hoods in dispensing area).	Chapter 140 Appendix B;B.1
On-Site Maintenance Welding	Chapter 140 Appendix B;B.10
On-Site Industrial Waste-Water Treatment	Chapter 140 Appendix B;B.14
Aluminum Chloride Tanks	Chapter 140 Appendix B;B.24
Handwiping Finishing Tables	Chapter 140 Appendix B;B.1
(12) 3,000 gal Tanning Material Storage Tanks	Chapter 140 Appendix B;B.1
6,000 gal Mineral Spirits Storage Tank	Chapter 140 Appendix B;B.1

C. Application Classification

The application for Prime Tanning includes a new buffing line to meet additional product sales mix and sales forecast. The new buffing line will be similar to the existing two buffing lines that Prime currently operates. The buffing line has a potential to emit PM emissions, therefore a baghouse with a high removal efficiency will be installed. There are no increases in licensed allowed emissions or fuel caps requested. Therefore the license is considered to be a renewal Part 70 License, with a minor amendment to add a new buffing line, issued under Chapter 115 and 140 of the Department's regulations for a Part 70 source.

II. AMENDMENT DESCRIPTION

New Buffing Line

Prime is requesting the installation of a new buffing line to its operations in response to current product sales mix and future sales forecast. Prime plans to start installation of this new line early in 2006. The new buffing line will be similar to the existing two buffing lines that Prime currently operates. The buffing operation involves the use of sandpaper to buff the leather to a suede-like feel and appearance. This operation emits dust which is filtered through an external baghouse to remove particulates with a removal efficiency of greater than 95%.

Process Equipment Emissions Record Keeping

In this Part 70 air license renewal, Prime is not requesting any changes to any of its current emissions limits, monitoring, or record keeping requirements with the exception of its HAPs tracking. In February 2005, EPA changed the Leather Finishing NESHAP regulations to allow an alternative method. This alternative method allows Prime to track HAPs the same way as the facility currently tracks VOCs. This method involves recording all purchases of VOCs and HAPs containing compounds and correcting for beginning and ending inventory and liquid finish waste shipments monthly for the facility as a whole. This information on quantity is factored by a database which has the amount of VOC or HAP in all Prime's purchased compounds, to get the total amount used every month.

III. FACILITY AND EMISSION UNIT DESCRIPTION

A. Process Description

Prime Tanning Company, Inc. (Prime) of Berwick, Maine owns and operates a leather color/re-tan and finishing manufacturing business. The facility has the average capacity to process 25,000 sides of blue stock to finish leather every week, which is equivalent to approximately 32,500,000 square feet of product processed per year. The Chromium tanning (beam house operations) is not done at this facility. On-site significant combustion sources include three #6 fuel oil-fired boilers. On-site process sources include coloring mills where coloring, retanning, and waterproofing is done by tumbling leather in large wooden drums with water, coloring, and other treatment chemicals. The leather is then dried using one of three drying processes (Vac-Dry, Toggle or Paste). The leather is then moved into

the “finishing” side of the operation. The finish – mechanical processes involve embossing, plating, tumbling or buffing (sanding) which alter the surface appearance, usually the grain surface. The finish- application operations involve spraying or directly applying either a film forming material or a coloring stain for color and/or physical properties. These operations generate VOC or HAPS emissions and are therefore the focus of potential reductions. The amount of VOCs or HAPS depends on the formulation of the finish. Different products have widely varying VOC or HAPS content. Water based formulations are more widely available for film forming applications than color stain. Prime also makes a large percentage (currently 35 to 45%) of waterproof products where water based formulations can not usually be used.

The following defines the types of coating applications and methods used at Prime:

- * Rotary Spray: Application of coating where spray guns are mounted on a unit that revolves continuously and sprays finish downward on leather as it is conveyed under those spray guns. Triggering of the HVLP spray guns are controlled by a light bar and a computer to spray only when leather is under the guns to reduce finish use and emissions. Prime has side leather and whole hide leather types of this equipment.
- * Roll Coating: A method of finishing where the finish is transferred to the leather from a rubber-coated or knurled steel roll directly to the leather surface. Prime has side leather and whole hide versions of this equipment.
- * Seasoning: A method of finishing where coating is pumped into a trough and is picked up by a rotating fluted roll. A rotary brush then transfers the finish from this roll directly on to the leather where it is “swabbed” to work the coating into the grain.
- * Manual Coatings are manually applied, i.e. using a hand-held pad, a hand-held cloth and/or hand spray HVLP gun. Many of the spray booths also have a 24” X 24” opening to hand spray leather for color matching purposes.

B. Specific Unit Requirements:

Boilers #1, #3, and #4

Since the issuance of the last air emissions license, Boiler #5 (propane-fired water heater) has been shut-down/removed from service and will no longer need to be

licensed. The following table includes the requirements associated with Prime Tanning's remaining fuel burning equipment along with the corresponding regulatory citation. It also "streamlines" requirements meaning that the most stringent of two or more applicable requirements supersedes the other less stringent requirements.

Regulatory Citation	Requirements (Emission limits, operational standards, etc.)
GENERAL STATE OF MAINE REQUIREMENTS	
Chapter 101 (A) (1)	Prime Tanning shall not emit or cause to be emitted any visible air contaminants from Boilers #1, #3, and #4 that exceeds an opacity of 30% on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. <i>(The BPT opacity limit will mirror the requirements of MEDEP Chapter 101, Section 2(B)(1), which contains the only applicable opacity standard. - No streamlining requested.)</i>
Chapter 103 (2) A (1)	Particulate Limit: 0.20 lb/ MMBtu for Boilers #1, #3, and #4. <i>(The BPT lb/MMBtu particulate matter limit will mirror the requirements of MEDEP Chapter 103, Section 2(A)(1), which contains the only applicable particulate matter standard. - No streamlining requested).</i>
Chapter 106	<ul style="list-style-type: none"> Fuel limited to 2.0 percent sulfur by weight as fired. <i>(The BPT sulfur content limit of 1.0% by weight to meet ambient air quality standards is more stringent, therefore the applicable requirements of Chapter 106 have been streamlined.)</i> Prime Tanning must maintain certification records of the fuel analysis provided by the supplier. Copies of all records and reports required by this regulation must be kept at Prime Tanning for a minimum period of three years. These records shall be available during normal business hours and copies provided to the Commissioner or his representative upon request.
Chapter 138	Fuel Cap in Part 70 Air Emission License A-376-70-A-I restricts total NOx emissions from the facility to 80.3 tons per year. Therefore, Prime Tanning is not considered a major source of NOx and is not subject to these requirements.
REQUIREMENTS OF PART 70 AIR LICENSE A-376-70-A-I AND SUBSEQUENT AMENDMENTS	
Amendment #4 A-376-72-D-A	Prime Tanning shall maintain sufficient records to document fuel use and sulfur content, and shall keep the records on file for a minimum of six years.
Amendment #4 A-376-72-D-A Condition (13)	Boilers #1, #3, and #4 are restricted to 2,000,000 gallons of No. 6 fuel oil with a sulfur content not to exceed 1% by weight on a twelve month rolling total.

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Regulatory Citation	Requirements (Emission limits, operational standards, etc.)	
Amendment #4 A-376-72-D-A Condition (14)	(Boiler #1)	(Boiler #3 and #4 - each)
	PM: 0.20 lb/MMBtu	0.20 lb/MMBtu
	7.20 lb/hr	4.5 lb/hr
	PM10: ---	---
	7.20 lb/hr	4.5 lb/hr
	SO2: ---	---
	37.69 lb/hr	23.6 lb/hr
	NOx: ---	---
	16.20 lb/hr	10.1 lb/hr
	CO: ---	---
	1.20 lb/hr	0.8 lb/hr
	VOC: ---	---
	0.07 lb/hr	0.04 lb/hr
(BPT establishes the only applicable lb/hr emission limit - No streamlining requested.)		

Periodic Monitoring for Boilers #1, #3, and #4

Emission Unit	Requirements (Recordkeeping/Reporting)
(Boilers #1,#3,#4,)	Prime Tanning must maintain certification records of the fuel analysis provided by the supplier. Copies of all records and reports required by this regulation must be kept at Prime Tanning for a minimum period of six years. These records shall be available during normal business hours and copies provided to the Commissioner or his representative upon request.
(Boilers #1,#3,#4,)	Prime Tanning shall maintain sufficient records to document fuel use and sulfur content, and shall keep the records on file for a minimum of six years.

Process Equipment

The following table shows the vented sources from the leather processing equipment:

Vented Source	Stack Height (ft)	Stack Diameter (in)	(CFM)	Range of Exit Temperature (° f)
Buffing Machines	Not Applicable	Not Applicable	5,000	Ambient
Buffing Preheater	25	8	900	800
Swab/Roll Application	23	24	10,000	Ambient
Swabbing table dryer	23	24	3,000	Ambient - 180

Tandem Spray #1	23	34	18,000	Ambient
Tandem Spray #1 dryer	28	18	3,000	Ambient - 180
Tandem Spray #2	27	34	18,000	Ambient
Tandem Spray #2 dryer	20	18	5,000	Ambient - 180
Binks Side Spray #1	40	22	15,000	Ambient
Side Carlessi Dryer #1	40	12	3,000	Ambient - 180
Binks Side Spray #2	40	22	15,000	Ambient
Carlessi Dryer #2	40	12	3,000	Ambient - 180
Whole Hide Binks Spray	40	34	20,000	Ambient
WH Carlessi Dryer	40	12	3,000	Ambient - 180
R&D Hand Spray	40	22	15,000	Ambient
Prematch Hand Spray #1	20	24	9,300	Ambient
Prematch Hand Spray #2	20	24	9,300	Ambient
Season Oil Preheater	22	8	600	800
Season Oil Dryer	27	12	5,000	Ambient - 180
Dual Down Spray #1	20	42	18,000	Ambient
Dual Down Dryer #1	26	16	3,800	Ambient - 180
Dual Down Dryer #2	26	16	3,800	Ambient - 180
Rollmac Dryer	40	12	3,000	Ambient - 180
Whole Hide Rollmac Dryer	40	12	3,000	Ambient - 180
Lab Hood #1	34	6	1,200	Ambient
Lab Hood #2	34	8	1,200	Ambient

The following gives a more detailed description of the methods of applications for finished leathers and also describes some of the ways to reduce emissions from each of the application methods.

Spray Lines

The spray lines have a spray economizer computer and utilize HVLP technology guns to reduce material use and VOC emissions. The spray booths have some additional features to further minimize the emissions. Some of the spray lines have a wet scrubber overspray collection system with a 90% PM control efficiency and some have dry collection pads with an 85% PM control efficiency. The spray booths are also designed to reduce the amount of material available for capture by taking steps to improve the transfer efficiency and re-cycling the finish material in the fluid lines.

Roll Coaters

Roll Coaters are a form of direct application technology for leather finishing. Direct application has the advantage of near 100% transfer efficiency thereby

reducing emissions. The machine uses a knurled roll to deposit finish on leather. Heavier finish applications with lower emissions are possible with this technology along with the potential to increase the range of available application rates. The newer models also have the option of a spreading device, which reduces the potential for the softer leathers to fold over while feeding into the machine. Whole hide machine, side machines with forward and reverse options, multiple roll options for different application requirements, and spreading feed roll options, are all included in Prime's various roll coating leather-finishing operations.

Season Oil

Season Oil machine is a direct application technology. It uses a brush roll to apply finish to leather. This machine has the capacity to pre-heat both the leather and the finish to allow waxes and oils to be applied without the use of solvents (VOCs). The application device is not vented but the dryer and the pre-heater are vented externally. The pre-heater has propane fired, tube-type burners. This machine can process up to 10,000 square feet per hour with a maximum finish formula consumption of 15 gallons per hour.

Dubois Machine

Another type of direct application machine. This machine uses a rubber roll to apply finish to leather. "Design" patterns can also be done to leather with this machine.

Buffing

The Buffing operation involves the use of sandpaper to buff the leather to a suede-like feel and appearance. This operation produces dust which is filtered through an external baghouse to remove particulates. One of the Buffing machines has a pre-heater device, to warm certain leathers for higher quality results from buffing.

Hand Spray

Hand spray is used for finishing small lots for research and development or for sample leathers. The operation is performed by hanging single sides, or smaller pieces, in a booth and finishing them with a hand-held HVLP spray gun. The coatings are the same as those applied on the production spray equipment. The hand spraying operation consists of four booths which will exhaust through one common stack. Each booth is equipped with high efficiency dry filter pads with an 85% particulate collection efficiency.

R&D Dryer

A small dryer to dry the finish on R&D or sample leather sides or pieces. This is a steam dryer with no exhaust stack, control device or associated material consumption.

C. BPT Analysis (Formerly BACT in Amendment A-376-70-C-A issued 8/7/02)

BPT for this renewal Part 70 air license will review the findings of the previous BACT analysis and incorporate these findings. The former BACT analysis included an evaluation of pollutant control technologies available for new spray lines and roll coaters in the leather industry. It was found that very few new technologies exist for reducing emissions from this type of equipment. Most of the existing spray lines were replaced with newer spray lines of similar design and function. The new lines have a spray economizer computer and use HVLP technology guns to reduce material use and VOC emissions. The new spray lines also have wet scrubber overspray collection systems with higher particulate reducing efficiency than the existing spray machines.

One improvement in roll coater technology is the use of heated finish material containers and heated application rolls. This allows, in some products, the use of heat to get certain finish materials into the leather rather than using solvents. The roll coaters can run both in the forward mode (synchro) and reverse modes, which increases the range of application rates available. The newer models also have the option of a spreading device, which reduces the potential for the softer leathers to fold over while feeding into the machine. Roll-coating technology is generally viewed as a control technology alternative to spray operations.

To meet the requirements of BPT, Prime shall meet the following:

- An annual (12-month rolling average) VOC limit of 14 lb/1000ft² of leather produced with an annual (12-month rolling average) 24 lb/1000 ft² if the leather is a waterproof leather. The monthly VOC limit is 38 lb/1000 ft².
- Equipment must use HVLP spray guns and spray control computer with electric eyes to minimize finish use and overspray.
- Prime must continue to maintain standard operating and maintenance procedures (SOMP) to minimize VOC emissions.
- Prime shall maintain and operate baghouses on the buffing lines per manufacturers' specifications.
- Total licensed allowed VOC emissions from Prime Tanning is limited to 290 tons per year, based on a 12-month rolling total.

D. Prior NSR Applicability Determination

Prime had requested and was licensed to consolidate finishing equipment, including roll coaters and spray lines, from the closure of their Rochester plant to the Berwick plant per Air License Amendment, A-376-70-C-A, issued August 7, 2002. The air license amendment reflected a “one to one” replacement of older Berwick equipment with newer, more efficient equipment from the Rochester plant. Federal New Source Review (NSR) was triggered since the rules recognize the change as “new” equipment for Berwick. NSR would require Lowest Achievable Emission Rate (LAER) and VOC offsets, if the modification was considered major for VOCs. BACT is applicable for a minor modification determination. Prime's replacement equipment was considered minor and a BACT analysis was conducted in Air License Amendment A-376-70-C-A.

E. Maximum Achievable Control Technology (MACT) update

Prime was issued Part 70 Air Emission License, A-376-70-A-I, on April 26, 2000. Since that time, a final “National Emission Standards for Hazardous Air Pollutants (NESHAP) for Leather Finishing Operations” was adopted on February 27, 2002. Prime is considered an existing source under this rule and is subject to the applicable sections. The Order Section of this renewal Part 70 air emission license addresses the major emission limits, recordkeeping, and reporting requirements as required under the leather finishing MACT.

IV. AIR QUALITY ANALYSIS

Prime Tanning previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Renewal Part 70 License. The inputs and findings of this modeling can be found in Prime's original Part 70 Air Emissions License, A-376-70-A-I issued April 26, 2000.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;

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- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-376-70-E-R pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Prime Tanning pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both; [MEDEP Chapter 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [MEDEP Chapter 140]

- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [MEDEP Chapter 140]
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [MEDEP Chapter 140]
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [MEDEP Chapter 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
- A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
- B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated August 28, 1996.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Boilers #1, #3, #4, #5	40 CFR Part 60 Subpart Db	Standards of Performance for steam generating units with a maximum heat input rate greater than 100 MMBtu/hr.	All units less than 100 MMBtu/hr

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Boilers #1, #3, #4, #5	40 CFR Part 60 Subpart Dc	Standards of Performance for Small industrial-Commercial-Institutional Steam Generating Units	Commenced construction prior to June 9, 1989
facility	40 CFR Part 61, Subpart V	Subpart is applicable to pumps, compressors, pressure relief devices, valves, flanges, and control devices that operate in volatile hazardous air pollutant (VHAP) service. VHAP includes only Benzene and Vinyl Chloride.	No equipment in benzene or vinyl chloride service at the Prime Tanning facility.
facility	40 CFR Part 63, Subpart B	Applies to major sources of HAPs in a source category/subcategory for which EPA fails to promulgate a standard by the 112 (j) deadline.	EPA has developed a MACT standard for the leather tanning process.
facility	40 CFR Part 63, Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.	Affects styrene/butadiene rubber production, polybutadiene rubber production and processes producing certain agricultural chemicals. No affected units at Prime.
facility	40 CFR Part 63, Subpart Q	Chromium Emissions from Industrial Process Cooling Towers	This standard applies to industrial process cooling towers that are operated with Chromium-based water treatment chemicals. No affected units at the facility.
facility	40 CFR Part 63, Subpart T	Standards of Performance for Halogenated Solvent Cleaners	For solvent cleaners containing methylene chloride, perchloroethylene, 1,1,1, trichloroethane, carbon tetrachloride, or chloroform. Prime does not operate solvent cleaners at the facility.
facility	Chapter 111	Petroleum Liquid Storage Vapor Control	Prime Tanning does not have any volatile petroleum liquids with vapor pressures greater than 1.0 psia stored in fixed roof storage vessels with capacities greater than 39,000 gallons.
facility	Chapter 117	Source Surveillance	Prime Tanning is not required to operate continuous emission monitors.
facility	Chapter 129	Surface Coating Facilities	Prime Tanning does not operate any of the surface coating operations outlined in this regulation
facility	Chapter 138	NOx RACT	The facility is limited to less than 99.9 tons of NOx per year.

[MEDEP Chapter 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the

original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

- B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
- C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
- D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[MEDEP Chapter 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license. [MEDEP Chapter 140]

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140; [MEDEP Chapter 140]

- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; [MEDEP Chapter 140]

Enforceable by State-only

- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [MEDEP Chapter 140]

Enforceable by State-only

- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license; [MEDEP Chapter 140]

- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [MEDEP Chapter 140]

- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

perform stack testing under circumstances representative of the facility's normal process and operating conditions:

within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department

that equipment may be operating out of compliance with emission standards or license conditions;

to demonstrate compliance with the applicable emission standards; or

pursuant to any other requirement of this license to perform stack testing.

install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

submit a written report to the Department within thirty (30) days from date of test completion.

[MEDEP Chapter 140] **Enforceable by State-only**

- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[MEDEP Chapter 140] **Enforceable by State-only**

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control

systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

All other deviations shall be reported to the Department in the facility's semiannual report.
[MEDEP Chapter 140]

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [MEDEP Chapter 140]
- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [MEDEP Chapter 140]

- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;
- [MEDEP Chapter 140]

SPECIAL CONDITIONS

- (14) The combined total fuel use for Boilers #1, #3, and #4 shall not exceed 2,000,000 gallons/year (based on a 12 month rolling total) of #6 oil with a sulfur content not to exceed 1.0% by weight. [MEDEP Chapter 140, BPT]
- (15) Emissions from each boiler (#1, #3, #4) shall not exceed the following limits:

<i>Pollutant</i>	<i>lb/MMBtu</i>	<i><u>Origin and Authority</u></i>	<i><u>Enforceability</u></i>
PM	0.20	MEDEP Chapter 103, Section 2(B)(1)(a)	-

(Boiler #1 lb/hour emission limits)

<i>Pollutant</i>	<i>lb/hr</i>	<i><u>Origin and Authority</u></i>	<i><u>Enforceability</u></i>
PM	7.2	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	7.2	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	37.7	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	16.2	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	1.2	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.07	MEDEP Chapter 140, BPT	Enforceable by State-only

(Boiler #3 and #4 lb/hour emission limits - each)

<i>Pollutant</i>	<i>lb/hr</i>	<i>Origin and Authority</i>	<i>Enforceability</i>
PM	4.5	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	4.5	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	23.6	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	10.1	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	0.75	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.04	MEDEP Chapter 140, BPT	Enforceable by State-only

- (16) Visible emissions from common stack #1 (Boilers #1, #3, and #4) shall not exceed an opacity of 30 percent on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. [MEDEP Chapter 140, BPT]
- (17) Visible emissions from the process equipment shall not exceed 5% opacity on a 6 minute block average basis, except for no more than 1 six minute block average in a one hour period. [MEDEP Chapter 140, BPT]
- (18) BPT limits for control of Volatile Organic Compounds (VOC): [MEDEP Chapter 134]

A) The total VOC emissions from the Prime Tanning Facility shall not exceed:

- a. 14.0 lbs VOC/1000 square feet of leather product on a 12 month rolling average basis and 38 lb/1000 square feet of leather product on a calendar month, where:
- i. the first 12 months started on April 1, 1997;
- ii. the pounds of VOC emissions are calculated by recording the VOC content (i.e. lb/gallons) of all material purchased and by recording the amount (i.e. gallons) of VOC containing material, excluding the materials purchased for the waterproofing process, used at the facility. Prime shall maintain records of the following:

- | | |
|--|-------------------------------|
| A. Beginning of Month Facility Storage | B. Monthly Facility Purchases |
| C. End of Month Facility Storage | D. Quantity Shipped off Site |

VOC emissions from the Prime facility shall be defined as follows, based on the information gathered from A. through D. above:

$$\begin{aligned} \text{Monthly VOC Emissions} &= (\text{A x VOC content}) + (\text{B x VOC content}) \\ &- (\text{C x VOC content}) - (\text{D x VOC content}) \end{aligned}$$

- iii. the square feet of the leather processed shall be documented by the area (square feet) measurements taken from the coloring room. Coloring is the one operation done only once and is not affected by returned or rejected products. The leather will be designated at this point as waterproof or non-waterproof leather.
- b. 24 lb of VOC/1000 ft² of leather product on a 12 month rolling average basis and 38 lb/1000 ft² of leather product during any one calendar month basis for all leather product that is subject to waterproofing operations, where:
 - i. the first 12 months started on April 1, 1997;
 - ii. the pounds of VOC emissions from the waterproofing process, are calculated by recording the VOC content (i.e. lb/gallons) of all material purchased (from MSDS or manufacturer information) and by recording the amount (i.e. gallons) of VOC containing material used for waterproofing at the facility. Prime shall maintain records of the following:
 - A. Beginning of Month Facility Storage
 - B. Monthly Facility Purchases
 - C. End of Month Facility Storage
 - D. Quantity Shipped off SiteVOC emissions from the waterproofing process at the Prime facility shall be defined as follows, based on the information gathered from A. through D. above:
$$\begin{aligned} \text{Monthly VOC Emissions} &= (\text{A x VOC content}) + (\text{B x VOC content}) \\ &- (\text{C x VOC content}) - (\text{D x VOC content}) \end{aligned}$$
 - iii. the square feet of the waterproof leather processed shall be documented by the area (square feet) measurements taken from the coloring room. Coloring is the one operation done only once and is not affected by returned or rejected products. The leather in the coloring room will be designated as waterproof or non-waterproof leather.
 - iv. the performance criteria for waterproof leather are defined in ASTM-D2099, and the leather designated as waterproof will have a "WT" (Weathertuff) attached to the product name.
- c. The total VOC emissions from the Prime Tanning facility shall not exceed 290 tons of VOC per year on a 12-month rolling total basis, where:

- i. the first 12 months started on August 1, 2002; and
 - ii. the tons of VOC emissions are documented by purchase records, which shall include the VOC content of all materials purchased. VOC emissions from the boilers are also included in this total.
- (19) Prime shall utilize electric eyes on all automatic spray lines at all times the lines are operating. The electric eyes shall be maintained and operated according to the manufacturer's specifications and operating procedures. [MEDEP Chapter 140, BPT]
- (20) Prime shall utilize high volume low pressure (HVLP) spray guns for all manual spraying and on all automatic spray lines at all times that the lines are operating. The HVLP guns shall be maintained and operated according to the manufacturer's specifications and operating procedures. [MEDEP Chapter 140, BPT]
- (21) Prime shall develop standard operating and maintenance procedures (SOMP) to minimize VOC losses, and post these procedures at the appropriate locations within the facility. These procedures shall contain at a minimum:
- a. A procedure to minimize the volatilization of solvents during the measuring of coating proportions and/or mixing of coatings;
 - b. A procedure to minimize VOC fugitive losses from the coating and solvent storage rooms. Procedures should include methods of securely sealing containers and methods to clean up accidental spills.
 - c. A procedure to minimize solvent usage or VOC losses during equipment cleanup, and during transport (including the transferring of coatings from the mixing areas to the coating lines.
- The SOMP plan shall become part of the BPT plan. Prime shall periodically review, at least annually, the SOMP plan for completeness and updating purposes. [MEDEP Chapter 140, BPT]
- (22) Prime shall keep chemical usage records to demonstrate compliance with all applicable emission limits as specified in their current air emission license A-376-70-A-I. All short-term emission limits remain unchanged from the existing air emission license. [MEDEP Chapter 140, BPT]
- (23) Prime shall meet the following applicable requirements per the National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations: [40 CFR Part 63, Subpart TTTT]

- A. Prime shall be in compliance with the HAP emission limit shown in the following table at all times, including periods of startup, shutdown and malfunction.

HAP Emission Limit Table

<u>Type of Leather Process Operation</u>	<u>HAP Emission Limit (# HAP loss/1,000 ft² of leather processed)</u>
Upholstery Leather (≥ 4 grams add-on/ft ²)	2.6
Upholstery Leather (< 4 grams add-on/ft ²)	6.8
Water-resistant ($\geq 5,000$ Maeser Flexes)/Specialty Leather	5.6
Nonwater-resistant Leather ($< 5,000$ Maeser Flexes)	3.7

- B. Prime submitted the one time Initial Notification by June 27, 2002 which included the following: [Reference 40 CFR 63.5415]
1. Name and address of the owner and operator of the facility;
 2. Physical address of the operation;
 3. Identification of relevant standard, such as the Leather Finishing Operations NESHAP, and compliance date; and
 4. A brief description of the source including types of leather product process operations and nominal operating capacity.
- C. Prime submitted the first annual compliance status certification, or other acceptable status certification allowed by the rule, 12 months after submission of the Notification of Compliance Status which included [Reference 40 CFR 63.5420]:
1. Name and address of the owner and operator of the facility;
 2. Physical address of the operation;
 3. Each type of leather product process operation performed during the 12-month period covered by the report;
 4. Each HAP identified in finishes applied during the 12-month period covered by the report; and
 5. A compliance status certification indicating whether the source complied with all the requirements of Condition (30) of this license throughout the 12-month period covered by the report. This certification shall include:
 - (9) Compliance that the procedures described in the plan for demonstrating compliance are being used;
 - (10) The compliance ratio value (as determined under 40 CFR 63.5330).

D. Prime shall submit a Deviation Notification Report for each compliance determination made in which the compliance ratio exceeded 1.00, as determined under 40 CFR 63.5330. This Deviation Notification Report must be submitted by 15 days of the following month in which the deviation was determined. The Deviation Notification Report must include:

1. Name and address of the owner and operator of the facility;
2. Physical address of the operation;
3. Each type of leather product process operation performed during the 12-month period covered by the report; and
4. The compliance ratio comprising the deviation.

E. Prime shall determine actual HAP loss. The entire HAP content of the finishes are assumed to be released to the environment. Multiply the pounds of each recorded finish usage by the corresponding mass fraction of HAP in the finish. The sum of the pounds of HAP loss from all finish applications recorded during the previous month is the total monthly pounds of HAP loss. Prime shall maintain records of the following:

- | | |
|--|-------------------------------|
| A. Beginning of Month Facility Storage | B. Monthly Facility Purchases |
| C. End of Month Facility Storage | D. Quantity Shipped off Site |

HAP emissions from the Prime facility shall be defined as follows, based on the information gathered from A. through D. above:

$$\begin{aligned} \text{Monthly HAP Emissions} &= (A \times \text{HAP content}) + (B \times \text{HAP content}) \\ &- (C \times \text{HAP content}) - (D \times \text{HAP content}) \end{aligned}$$

[Reference 40 CFR 63.5335]

F. Prime shall determine allowable HAP loss by the 15th of each month for the previous month [Reference 40 CFR 63.5340]

1. Select the appropriate HAP emission limit from the table in Condition 3 (B) of this amendment.
2. Determine the annual total of leather processed in 1,000's of square feet for each product process operation in accordance with 40 CFR 63.5400:
3. Multiply the annual total of leather processed in each process by the corresponding HAP emission limit to determine the allowable HAP loss in pounds for the corresponding process.
4. Sum the pounds of HAP loss from all leather product process operation performed in the previous 12-months.
5. The resulting HAP loss is used to calculate the compliance ratio

- G. Prime shall determine the compliance ratio for each month.
[Reference 40 CFR 63.5330]

The compliance ratio is the Actual HAP loss / Allowable HAP loss where the Actual HAP loss is determined in accordance with 40 CFR 63.5335 and the Allowable HAP loss is determined in accordance with 40 CFR 63.5340.

- H. Prime shall maintain the compliance ratio at or below 1.00. [Reference 40 CFR 63.5330]
1. If the compliance ratio is less than or equal to 1.00, the source is in compliance.
 2. If the compliance ratio is greater than 1.00 the source is deviating from compliance.

Prime shall maintain records required to demonstrate compliance.
[Reference 40 CFR 63.5430]

(24) Buffing Lines and Lime Silo

Emissions from the buffing lines and lime silo shall vent through bag houses and shall be limited to 10% opacity on a six minute block average. The bag houses at Prime must be used to control PM emissions and operated properly at all times buffing is being performed. To ensure proper baghouse collection efficiency, a gauge will be used to monitor the pressure drop across the bags and be maintained between manufacturer's specifications.

Prime will develop an inspection checklist for bag houses. The facility shall perform a monthly inspection of bag houses in continuous use to ensure there are no broken, torn, or clogged bags or filters that would allow excess emissions. The monthly inspections of the bag houses are required only when they are in use. Depending on workload, there are periods when some bag houses are not used for several weeks or months. Baghouses which have not been in use for more than one week shall be inspected upon startup.

- i Whenever compliance testing is required, USEPA Method 9, shall be used. When approved in writing an equivalent test method may be substituted for the required test method.

-ii Prime shall maintain the following records:

- a) Prime will perform daily visual inspections of the baghouses to assure proper baghouse operations and have documentation that this will be done in their Standard Operating Procedure manual.
- b) A description of any maintenance or repairs of the baghouse that resulted from the inspection will be kept on file.

[MEDEP Chapter 140]

(25) Parts Washer

Parts washers that use a solvent degreaser containing greater than 5% VOC are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:

- A. Prime Tanning shall keep records of the amount of solvent added to each parts washer. [MEDEP Chapter 130]
- B. Prime Tanning shall equip each cold cleaning degreaser unit with a cover that is easily operated with one hand if [MEDEP Chapter 130]:
 1. the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 °F by ASTM D323-89; or,
 2. the solvent is agitated; or,
 3. the solvent is heated.
- C. Prime Tanning shall attach a permanent conspicuous label to each cold cleaning degreaser unit summarizing the following operational standards [MEDEP Chapter 130]:
 1. Close the covers on all solvent degreasing tanks when the tanks are not in use;
 2. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
 3. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
 4. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
 5. Minimize drafts to less than 40 meters/minute; and
 6. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired.
- D. Prime Tanning shall not use any halogenated solvents in the degreasing tanks. [MEDEP Chapter 130, BPT]

- E. For those degreasers containing less than 5% VOC, Prime Tanning shall keep the degreasers' Material Safety Data Sheets (MSDS) on file. [MEDEP Chapter 140, BPT]
- (26) **Fugitive Emissions**
Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20 percent, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20 percent in any one (1) hour. [MEDEP Chapter 101]
- (27) **General Process Sources**
Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [MEDEP Chapter 101]
- (28) **Monitoring and Recordkeeping Requirements**
[MEDEP Chapters 140, 117, and 122]
- A. The following are identified as Periodic Monitors:
1. Prime Tanning must maintain certification records of the fuel analysis provided by the supplier.
 2. Prime Tanning shall maintain sufficient records to document fuel use and sulfur content, and shall keep the records on file for a minimum of six years.
 3. Prime Tanning shall calculate VOC emissions as specified in Special Condition (18) of this air emissions license.
- B. The following are identified as Parameter Monitors:
1. The electric eyes on all automatic spray lines shall be maintained and operated according to the manufacturer's specifications and operating procedures.
- C. Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions. **Enforceable by State-only**

(29) Semiannual Reporting

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 31st and Jan 31st of each year. The facility's designated responsible official must sign this report.

The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.

- A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
[MEDEP Chapter 140]

(30) Annual Compliance Certification

Prime Tanning shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 31 of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [MEDEP Chapter 140]

(31) Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- A. A computer program and accompanying instructions supplied by the Department;

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or

B. A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

The emission statement must be submitted no later than July 1 or as otherwise specified in Chapter 137.

[MEDEP Chapter 137]

(32) Air Toxics Emissions Statement

If Prime Tanning exceeds the thresholds for HAPs listed in Appendix A of MEDEP Chapter 137 in an inventory year, in accordance with MEDEP Chapter 137 the licensee shall report, no later than July 1 every three years (2005, 2008, 2011, etc.) or as otherwise stated in Chapter 137, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a computer program supplied by the Department or a written emission statement containing the information required in MEDEP Chapter 137. NOTE: Based on emission factors developed by the Eastern Research Group (ERG) in their memo "Development of Average Emission Factors and Baseline Emission Estimates for the Industrial, Commercial and Institutional Boilers and Process Heaters National Emission Standard for Hazardous Air Pollutants" dated October 2002, Prime will most likely exceed the Chapter 137 thresholds of HAPs based on fuel burning alone should the facility exceed the following firing rates in a calendar year:

Fuel	Control Device	Quantity of fuel before Chapter 137 toxics reporting threshold is exceeded
#6 Fuel Oil	No control	64,725 Gallons
#6 Fuel Oil	Cyclone	72,072 Gallons
#6 Fuel Oil	ESP	647,249 Gallons
#2 Fuel Oil	No Control	661,376 Gallons
#2 Fuel Oil	ESP	732,601 Gallons

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Reports and questions should be directed to:

Attn: Toxic's Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437 [MEDEP Chapter 137]

(33) General Applicable State Regulations

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(34) Units Containing Ozone Depleting Substances

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs.

[40 CFR, Part 82, Subpart F]

(35) Asbestos Abatement

When undertaking Asbestos abatement activities, Prime Tanning shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(36) Expiration of a Part 70 license

Prime shall submit a complete Part 70 renewal application at least 6 months prior, but no more than 18-months prior, to the expiration of this air license. Pursuant to Title 5 MRSA §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the renewal of the Part 70

license An existing source submitting a complete renewal application under Chapter 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. [MEDEP Chapter 140]

(37) **New Source Review**

Prime is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emissions license and remain in effect even if this Chapter 140 Air Emissions License, A-376-70-E-R, expires.

(38) **Annual Fee**

Prime Tanning shall pay the annual air emission license fee within 30 days of May 30th of each year. Pursuant to 38 MRSA-353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2006.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: April 22, 2005

Date of application acceptance: April 25, 2005

Date filed with the Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality.

**PRIME TANNING COMPANY
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